

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

LOWTECH STUDIOS, LLC,
Plaintiff,

v.

KOOAPPS LLC, JONATHAN CHANG,
AND CHUN-KAI WANG
Defendants.

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CASE NO. 1:23-cv -1437-DII

JOINT STIPULATION REGARDING INTERIM DEADLINES

Plaintiff Lowtech Studios, LLC and Defendants Kooapps LLC, Jonathan Chang, and Chun-Kai Wang, by and through their respective counsel, hereby stipulate, subject to approval of the Court, to set the following interim deadlines within the fact discovery period established by the April 22, 2024 Agreed Scheduling Order, Dkt. 27. The deadlines in this stipulation do not modify or otherwise affect any of the deadlines set in the Agreed Scheduling Order.

December 18, 2024	Parties exchange identification of custodians, ESI and Document sources, and search terms. Stipulated eDiscovery Plan and Protocols, Dkt. 56 at II.a. and II.c.
December 20, 2024	Deadline to commence rolling production of documents.
January 31, 2025	Substantial completion of document production.
March 7, 2025	Substantial completion of fact witness depositions.

Pursuant to stipulation, it is so ORDERED.

Dated: _____

United States District Judge

Date: December 17, 2024

By: /s/ Russell E. Blythe

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Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing document was served on the attorneys of record by delivering a true and correct copy on December 17, 2024, as follows:

Via the Court's Filing eService to:

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